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6 Attorneys for Defendant
JESUS PENA-GAMEZ
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JESUS PENA-GAMEZ,

15 Defendant.
16
17

Case No.: 1:21-cr-000107-DAD-BAM-2

**STIPULATION TO CONTINUE
SENTENCING; ORDER**

Date: April 4, 2022
Time: 9:00 a.m.
Judge: Hon. Dale A. Drozd

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
19 counsel, Assistant United States Attorney Christopher D. Baker, counsel for plaintiff, and
20 Assistant Federal Defender Reed Grantham, counsel for defendant Jesus Pena-Gamez, that the
21 sentencing hearing currently scheduled in the above-captioned matters for March 14, 2022, at
22 9:00 a.m., before the Honorable Dale A. Drozd, be continued to April 4, 2022, at 9:00 a.m.

23 On December 14, 2021, Mr. Pena-Gamez entered a guilty plea to Count 5 of the
24 Indictment filed on April 22, 2021. *See* Dkt. #34, 20. At that time, the matter was set for
25 sentencing on March 14, 2022. *See* Dkt. #34. The draft Presentence Investigation Report (PSR)
26 was filed on January 31, 2022, and a final PSR were filed on February 23, 2022. *See* Dkt. #37.

27 The defense is requesting this continuance to obtain additional records and documents
28 relevant for sentencing in this matter. The requested continuance is made with the intention of

1 conserving time and resources for both the parties and the Court. The government is in
2 agreement with this request and the requested date is a mutually agreeable date for both parties.
3 Additionally, the parties request that the due date for any formal objections to the PSR be
4 modified so that any formal objections are to be filed on or before March 21, 2022. As this is a
5 sentencing hearing, no exclusion of time is necessary.

6
7 Respectfully submitted,

8 PHILLIP A. TALBERT
9 United States Attorney

10 Date: February 25, 2022

/s/ Christopher D. Baker
11 CHRISTOPHER D. BAKER
12 Assistant United States Attorney
Attorney for Plaintiff

13 HEATHER E. WILLIAMS
14 Federal Defender

15 Date: February 25, 2022

/s/ Reed Grantham
16 REED GRANTHAM
17 Assistant Federal Defender
Attorney for Defendant
JESUS PENA-GAMEZ

18
19 **ORDER**

20 IT IS HEREBY ORDERED that the sentencing hearing scheduled for Monday, March
21 14, 2022, at 9:00 a.m. be continued to Monday, April 4, 2022, at 9:00 a.m. before the Honorable
22 Dale A. Drozd. Any formal objections to the Presentence Investigation Report are to be filed on
23 or by March 21, 2022.

24 IT IS SO ORDERED.

25 Dated: February 25, 2022


26 DALE A. DROZD
27 UNITED STATES DISTRICT JUDGE
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